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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE LIPOCINE INC.
SECURITIES LITIGATION

This Document Relates To:
All Actions

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Civ. Action No.: 16-4009-BRM-LHG

STIPULATION AND [PROPOSED] ORDER

Lead Plaintiff Lipocine Investor Group (“Plaintiff”) and Defendants Lipocine Inc., Mahesh V. Patel, and Morgan R. Brown (collectively, “Defendants”), by and through their attorneys, hereby stipulate and agree to the following.

1. WHEREAS, the initial complaint in the above-captioned action was filed on July 1, 2016;
2. WHEREAS, on July 6, 2016, a securities class action was filed in the District of New Jersey, captioned *Morassi v. Lipocine Inc., et al.* (No: 3:16-cv-04067-PGS-LHG) (the “*Morassi* Action”);

3. WHEREAS, on July 7, 2016, a securities class action was filed in the District of New Jersey, captioned *Burleson v. Lipocine Inc., et al.* (No: 3:16-cv-04129-PGS-LHG) (the “*Burleson Action*”);

4. WHEREAS, on December 2, 2016, the Court entered an order consolidating the *Morassi Action* and *Burleson Action* with the above-captioned action, adopting a consolidated caption and appointing lead counsel. (Dkt. 21);

5. Defendants anticipate filing an Unopposed Motion to Transfer Venue (“Motion to Transfer”) in the next seven (7) days;

NOW THEREFORE, it is hereby stipulated and agreed by the parties to this action, by and through their undersigned counsel, as follows:

1. Plaintiffs’ consolidated amended complaint shall be due forty-five (45) days after the Order to Transfer is entered.

2. Defendants’ motion to dismiss shall be due forty-five (45) days after Plaintiffs’ consolidated amended complaint is filed;

3. Plaintiffs’ response shall be due forty-five (45) days after Defendants’ motion to dismiss.

4. Defendants’ reply shall be due thirty (30) days after Plaintiffs’ response.

IT IS SO STIPULATED.

Dated: December 8, 2016

/s/ David A. Kotler

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Counsel for Lipocine Investor Group

* * *

ORDER

IT IS SO ORDERED

Dated: _____

U.S. District Court Judge